

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA, *et al.*,

Plaintiffs,

v.

CHIEF JUDGE GEORGE L. RUSSELL III, in his official capacity, *et al.*,

Defendants.

No. 1:25-cv-02029

**MOTION FOR LEAVE TO FILE INSTANTER BRIEF OF AMICUS CURIAE IN SUPPORT OF PLAINTIFFS' COMPLAINT AND MOTION FOR RECUSAL**

Rule 29, Amicus Curiae Shaunesi Yvette DeBerry respectfully requests leave of this Court to file an amicus brief in support of Plaintiffs' Complaint and Motion for Recusal. This motion is supported by the following memorandum. The brief Shaunesi Yvette DeBerry proposes to file is attached as Exhibit A.

Respectfully submitted,



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## **MEMORANDUM IN SUPPORT**

Shaunesi Yvette DeBerry seeks to file a brief as amicus curiae as the only statewide American born “criminal petitioner” on behalf of Maryland citizens whose mission it is to advocate for the human, civil and legal rights of *sui juris* Marylanders with pending Writ of Habeas Corpus petitions before this court who’ve been denied relief although allowed under the All Writs Act.

The right to due process in pending Writs of Habeas Corpus, and is a matter of great public interest.

Amicus briefs are particularly helpful where the issue is a matter of great public interest, and in such cases leave is generally granted.

Shaunesi’s brief provides the Court with useful information about the need for due process for all under the All Writs Act in assuring petitioners are able to participate in matters in this federal court pending review and that the recent interest of the state and judiciary in immigrants more than their own citizens finds a more neutral, non-discriminatory or discrete approach to its own citizens in the height constant news and social media statements surrounding the importance of due process for all. This brief was filed in a timely manner in this fast-evolving judicial review process.

## **STATEMENT OF INTEREST**

Shaunesi Yvette DeBerry is Maryland resident, human rights advocate, legal scholar, and believed to be “criminal petitioner” in pending Writ of Habeas Corpus *Case 1:25-cv-01080-TDC DeBerry v. Maryland Department of Public Safety & Correctional Services et al.* pending before this court in which Judge Chaung affirmed uncertainty of whether a conviction or sentence even exists yet denied emergency relief to stay a state maliciously issued failure to appear No bond bench warrant April 22, 2025. DeBerry’s mission is to advocate for the human, civil, and legal rights of all American people in the State of Maryland. Through her own experience with the State of Maryland and as a voice for other DeBerry has been forced to investigate abuse, neglect, and rights violations affecting Every day Marylanders and pursues administrative, legal, and policy remedies to address identified violations; and advocates for herself and other individuals in many areas of human rights, including simple due process in the Maryland Judiciary both State and Federal.

Due Process should be a God given right to all, however due to the recent interest in the Attorney General, Politicians, and judiciary in Maryland showing a more vested interest in wrongly detained or deported illegal aliens DeBerry reflects in her priorities an interest in due process for all. This work includes self ligating through her own due process violations by the State of Maryland, to ensure others whether naturally born U.S. Citizens or not, case derives from the State of not, does not have their due process violated before this court or any other federal court where protections are available for all under The All Writs Act.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing was filed electronically on June 26, 2025. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.



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